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8 **UNITED STATES DISTRICT COURT**
9 **DISTRICT OF NEVADA**

10 UNITED STATES OF AMERICA,
11 Plaintiff,
12
13 v.
14 ALEXANDER GALLEGOS,
15 Defendant.

Case No. 2:11-cr-00455-GMN-CWH

**STIPULATION TO CONTINUE
REVOCATION HEARING**
(First Request)

16
17 IT IS HEREBY STIPULATED AND AGREED, by and between Nicholas A.
18 Trutanich, United States Attorney, and Nicholas Dickinson, Assistant United States Attorney,
19 counsel for the United States of America, and Rene L. Valladares, Federal Public Defender,
20 and Brian Pugh, Assistant Federal Public Defender, counsel for Alexander Gallegos, that the
21 Revocation Hearing currently scheduled on April 8, 2020, be vacated and continued to a date
22 and time convenient to the Court, but no sooner than sixty (60) days.

23 This Stipulation is entered into for the following reasons:

- 24 1. Counsel for the defendant needs additional time to conduct investigation and to
25 prepare for the revocation hearing in this case.
26 2. In light of the COVID-19 pandemic, the defendant and counsel for the defendant
are attempting to adhere to recommended social distancing practices, including teleworking and

1 minimizing personal interactions to those that are absolutely necessary. Based upon age (60),
2 counsel for the defendant falls into an at-risk category. For these reasons, investigation and
3 hearing preparation are difficult.

4 3. The additional time requested herein is not sought for purposes of delay, but
5 merely to allow counsel for defendant sufficient time within which to be able to effectively and
6 complete investigation of the discovery materials provided.

7 4. The defendant is in not custody and agrees with the need for the continuance.

8 5. The parties agree to the continuance.

9 This is the first request for a continuance of the revocation hearing.

10 DATED this 01 day of April, 2020.

11
12 RENE L. VALLADARES
Federal Public Defender

NICHOLAS A. TRUTANICH
United States Attorney

13
14 By /s/ Brian Pugh

15 BRIAN PUGH
16 Assistant Federal Public Defender

By /s/ Nicholas Dickinson

NICHOLAS DICKINSON
Assistant United States Attorney

1 UNITED STATES DISTRICT COURT

2 DISTRICT OF NEVADA

3 UNITED STATES OF AMERICA,

4 Plaintiff,

5 v.

6 ALEXANDER GALLEGOS,

7 Defendant.

Case No. 2:11-cr-00455-GMN-CWH

ORDER

9
10 IT IS THEREFORE ORDERED that the revocation hearing currently scheduled for
11 Monday, April 8, 2020 at 11:00 a.m., be vacated and continued to June 17, 2020, at the hour
12 of 10:30 a.m. in Courtroom 7D before Judge Gloria M. Navarro.

13 DATED this 2 day of April, 2020.

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16 UNITED STATES DISTRICT JUDGE